

SUMMARY OF LADWP COMMENTS ON GBUAPCD 2012 ANNUAL NETWORK PLAN

LADWP submitted comments to GBUAPCD during the 2012 annual network plan (ANP) comment period on 5/16/2012. GBUAPCD responded to these comment via an internal memorandum on 5/23/2012, which was included with the final 2012 ANP submitted to EPA on 6/29/2012. LADWP has subsequently sent a letter to EPA on 9/28/2012 expanding upon the comments made in the 5/16/2012 letter, and providing responds to GBUAPCD's responses in the 5/23/2012 memoranda. Generally, LADWP does not believe that their comments were adequately considered by GBUAPCD.

- The 2012 network plan cannot be approved by EPA because GBUAPCD's PM₁₀ and PM_{2.5} Quality Assurance Project Plans (QAPPs) have not been approved by EPA.
 - While the ARB QAPP does cover the SLAMS network, it does not cover the use of those data to identify supplemental control areas on Owens Lake
 - The QAPP does not assure quality for all the instrument systems that are used in the dust ID process described in the 2008 SIP.
 - The plan should clarify that GBUAPCD does not have an independent approved PM₁₀ and PM_{2.5} QAPPs.
 - 2008 CARB TSA language contradicts the assertion that GBUAPCD is covered under a CARB QAPP.
- The current network does not adequately assess the contributions from other source areas, which is much larger than Owens Lake.
 - Should extend the network to encompass upwind source areas.
 - Should identify off-lake source areas and monitor them for both sand motion and dust emissions.
 - Modeling does not include any off-lake sources.
- The Keeler PM₁₀ and PM_{2.5} monitors appear to violate EPA siting criteria.
 - LADWP quotes the "spacing for minor sources" language in 40 CFR 58 App. E and contends that the network of unpaved roads around the site violate EPA's criteria.
 - The purpose of Keeler is to record emission from Owens Lake, not to monitor the influence of nearby sources.
 - If Keeler monitor is used to calculate emissions factors, the localized influences must first be subtracted out of the equation.
- The North Beach PM₁₀ monitor appears to violate EPA siting criteria.
 - Same concerns as Keeler: the monitor is adjacent to unpaved roads
- The Flat Rock monitor was discontinued in April 2011, without explanation.
 - Believe that this monitor was recording emissions from an off-lake source.
 - Site was replaced by the Mill Site, which may also be influenced by off-lake sources.
 - GBUAPCD should justify these network modifications.
 - Should install sand motion monitoring device at the Mill Site
- GBUAPCD improperly utilizes data from the Coso Junction PM₁₀ to assess contributions from Owens Lake.
 - The Dust ID model has very poor predictive capability
 - Dust ID protocol in 2008 SIP does not address the unique surface conditions and meteorological conditions that occur in between Owens Lake and Coso Junction
 - Dust ID model does not include off-lake source areas that influence downwind dust concentrations.
- The plan does not disclose the locations or uses of data for the two special purpose monitors: T-4 and T-23
 - If GBUAPCD does not provide the requested information, LADWP will withdraw its agreement and protest any use of any on-lake TEOM data on ground that it violates the 2008 SIP.